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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.; OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

DECLARATION OF LINDSAY COOPER IN SUPPORT OF DEFENDANTS' ADMINISTRATIVE MOTION TO FILE UNDER SEAL (DKT. 409)

I, Lindsay Cooper, declare as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Defendants' Administrative Motion to Seal portions of their Response to Waymo's Supplemental Brief Regarding Haslim Testimony, and Supporting Exhibits Thereto (the "Administrative Motion"). The Administrative Motion seeks an order sealing certain highlighted portions of Defendants' Response to Waymo's Supplemental Brief Regarding Haslim Testimony, and Supporting Exhibits Thereto (Dkt. 409) ("Defendants' Response and Supporting Exhibits").

3. Portions of Defendants' Response and Supporting Exhibits (including Yang Exhibit 1-2 and 4-6 contain or refer to trade secret and confidential business information, which Waymo seeks to seal.

4. Portions of Defendants' Response (portions highlighted in green), portions of Yang Exhibits 1-2 and 4 (portions highlighted in green) and Yang Exhibits 5-6 (entire documents) contain, reference, and/or describe Waymo's asserted trade secrets. The information Waymo seeks to seal includes the confidential design and functionality of Waymo's proprietary autonomous vehicle system, which Waymo maintains as secret. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-47) and are valuable as trade secrets to Waymo's business (Dkt. 25-31). The public disclosure of this information would give Waymo's competitors access to in-depth descriptions—and analysis—of the functionality of Waymo's autonomous vehicle system. If such information were made public, I understand that Waymo's competitive standing would be significantly harmed.

5. Waymo's request to seal is narrowly tailored to those portions of Defendants' Response that merit sealing, and the scope of information that Waymo is seeking to seal is consistent with other administrative motions to seal that have already been granted by the Court in this case. (*See* Dkt. 416, 414, 406, 393, 392.)

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed in San Francisco, California, on May 15, 2017.

By */s/ Lindsay Cooper*
Lindsay Cooper
Attorneys for WAYMO LLC